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August 17, 2023

VIA ECF

The Honorable Jennifer E. Willis
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

GRANTED. SO ORDERED.

A handwritten signature in black ink that reads "Jennifer E. Willis".

Jennifer E. Willis
United States Magistrate Judge
August 18, 2023

Re: *Jimenez v. Senior Exchange, Inc.*; Case No. 1:23-cv-00323 (ALC) (JW)

Dear Judge Willis:

We represent plaintiff Vanessa Jimenez (“Plaintiff”) in the above-referenced action. Plaintiff filed this action against defendant Senior Exchange, Inc. (“Defendant”) on January 13, 2023. Defendant filed its answer on May 10, 2023. On July 12, 2023, the parties agreed to a Case Management Plan (“CMP”) establishing August 18, 2023 as the last date to amend pleadings. Your Honor approved the CMP on July 19, 2023. The parties have since discussed anticipated motion practice and amended pleadings, including Plaintiff’s request for an extension of one (1) week to submit an Amended Complaint. The parties have agreed to the following, provided it meets with the Court’s approval:

- Plaintiff’s deadline to submit an Amended Complaint shall be extended to August 25, 2023;
- Defendant shall respond to the Amended Complaint on or before September 24, 2023;
- If Defendant files a Motion to Dismiss the Amended Complaint, Plaintiff shall file opposition papers on or before October 24, 2023, and Defendant shall file reply papers on or before November 7, 2023.

The parties do not expect other deadlines in the CMP to be affected. A proposed stipulation and order is enclosed for the Court to review.

Respectfully submitted,
/s/ Edward Y. Kroub
EDWARD Y. KROUB